



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

999 18TH STREET - SUITE 500
DENVER, CO 80202-2466

JUN 1 - 1999

Ref: 8ENF-T

CERTIFIED MAIL
RETURN RECEIPT REQUESTEDMr. David Suhr
Idle Properties Manager
Hecla Mining Company
6500 Mineral Drive
Coeur d'Alene, ID 83815-8788

Re: U.S. EPA Region VIII Request for Information from Hecla Mining Company Pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA) (42 U.S.C. 6927) and Section 308 of the Clean Water Act (CWA) (33 U.S.C. 1318) for the Hecla Pond, Paiute Reservation, St. George, Utah

Dear Mr. Suhr:

EPA performed a compliance evaluation inspection (CEI) under RCRA and NPDES authorities at the Hecla Pond, a wastepile, on November 16, 1998. As a followup to that inspection, EPA sent you a letter dated January 15, 1999, requesting submittal of information related to this wastepile. You provided information responding to this letter in your submittal dated February 12, 1999. We are asking you to certify the validity of your prior submittal. Also, we request that you expand or clarify some of your previous responses or provide the separate additional information requested in this letter.

Pursuant to Section 3007 of RCRA and Section 308 of the CWA, EPA requests that Hecla Mining Company submit the following information not more than twenty (20) calendar days after your receipt of this letter. Precede each answer with the number of the question to which it corresponds. If the question is not applicable to the facility, please indicate N/A.

1. The correct name and street address of the facility; city; township, range, quarter-sections and fractions; latitude and longitude, if know; county and state in which the facility is located. Please also include the mailing address for this facility.



2. The date the facility began operations at the current location and a short history of site ownership and usage.
3. A description of the facility, including a description of the surrounding area and its use (i.e., agriculture, ranching, recreation, commerce, residential, etc.), and proximity to water, wetlands and marshes or environmentally sensitive areas, drinking water wells, etc. Please include a facility layout map, showing all ponds, ditches, and other physical features, including storm water diversion berms.
4. The name of the person(s) responsible for compliance with environmental requirements for the Hecla Pond 2, the wastepile. Please include the titles, addresses, and telephone numbers for each person identified.
5. The name and street address of the current owner(s) of the Hecla wastepile, including Dun & Bradstreet number. Also, provide names and current addresses of the parent corporation and all owners of the business for the last two years.
6. State whether the facility or business is incorporated and, if so, the state under which laws it is organized. Please provide the name and address of the president or CEO.
7. Please provide a detailed discussion which provides specifics on the pond rehabilitation, waste removal and relocation and pond refurbishment, including clean-up standards and confirmatory sampling results. For each separate source of material placed into the Hecla wastepile (designated as Pond 2), please describe its origin, the quantity and type of material, moisture content, characterization data for the contents, and describe any material handling (i.e., neutralization, stabilization, etc.) conducted on the waste prior to its placement in the Hecla wastepile. If there is no laboratory data, please provide a description which estimates the percentage of the metals present (i.e., 4% lead, 1% mercury, etc.) and other materials such as solvents or organics which could be present in the waste material.

For data previously submitted for the St. George Mining Company pond wastes collected in 1988, please indicate if the pond wastes sampled were subsequently mixed with other wastes between the sample date and the excavation and consolidation date. Please provide the exact date on which each pond material or feedstock was excavated and placed in the Hecla wastepile.

8. Please provide further specifics on the source, type, characteristics, and quantity of the unmilled ore placed into the Hecla pond, referenced in your February 12, 1999, response to Request 1. Please provide all of the sampling data conducted as required per Exhibit E of the Purchase and Sales Agreement between Hecla and OMG, not submitted in the February 1999 submittal. This should include, but not be limited to, all sampling results for 1) the ore storage areas, 2) soil stockpile from the plant excavation, 3) the soil stockpile from unknown origin, 4) plant area, 5) windblown areas, 6) the surge pond, and the sites designated as "BG" areas.
9. For the gallium processing conducted by St. George Mining and by Hecla, please identify the specific major chemical additives, such as compounds for pH adjustment, acids, solvents,

cleaners, flocculents, etc. Please identify the volumes and/or flowrates for the products, process streams, and waste streams from this processing. Please include all analytical data for these waste streams.

10. For the germanium processing conducted by St. George Mining and by Hecla, please identify the specific major chemical additives, such as compounds for pH adjustment, acids, solvents, cleaners, flocculents, etc. Please identify the volumes and/or flowrates for the products, process streams, and waste streams from this processing. Please include all analytical data for these waste streams.

11. For the cobalt processing, please identify the specific major chemical additives, such as compounds for pH adjustment, acids, solvents, cleaners, flocculents, etc. Please identify the volumes and/or flowrates for the products, process streams, and waste streams from this processing. Please include all analytical data for these waste streams.

12. Please provide copies of all cobalt recovery operational records in your files or to which you can obtain access, including feedstock sources and screening records..

13. Copies of any information, not previously submitted, regarding the Closure Plan, or other such documents which address the dimensions, design, compaction and cap criteria for the construction and closure of the current Hecla wastepile, designated as Pond 2. Also, provide a detailed discussion of the closure activities including cap construction, monitoring activities, and maintenance of the capped area and leachate collection system. Please include the survey elevation for the cap when closed in 1996 and the current elevation.

14. Copies of notifications, licenses, and permits for the plant during the years of St. George and Hecla operation. This includes any permits, approval orders, plans, licenses, etc., issued by state, federal or local authority, for air, water, solid waste, radiation, etc. at the facility.

15. Please provide specifics on the pond construction details, which identify the number of ponds and who constructed them for all ponds at the Hecla facility. This discussion should address the pond maintenance activities during years of usage including specifics on debris and sediment removal such as volume removed, how it was managed, and any corresponding characterization data. This discussion should include the pond dimensions, pipelines or other conveyances interconnecting the ponds, materials of construction including liners and when such liners were installed. This discussion should describe which ponds were the primary wastewater recipient and which were backup ponds. A discussion of any pond releases or discharges including time frame, duration, and drainage to which the release flowed should be included.

16. Please identify and describe the feedstock and waste storage areas during the years of Hecla operation. Please indicate these on an appropriate plant layout map.

17. A description of all wastewater treatment system(s) at the facility during the years of Hecla's and St. George's operations, including but not limited to septic tanks, leach fields, pH adjustment and monitoring systems and the current status of these systems if known.

18. For all on-site wells and boreholes, please provide the well logs, borehole logs, well construction details (depth, screening, etc.), and a copy of the well permits. Also provide a description of the general groundwater quality/quantity in the immediate area of the facility, including the major aquifers in the area and a geologic cross section which includes the depth and quality and confining formations. Please also provide copies of all site groundwater data, groundwater level data and dates measured and analytical data for the current Hecla Pond 2 leachate and waste material.
19. A discussion of Hecla's future plans regarding further capping, monitoring and maintenance, or reclamation of the current Hecla Pond 2, the wastepile, including any current detailed documents supporting such work.
20. A discussion of additional measures taken, since your February 1999 letter, to address the condition of the small leachate collection ditch and small leachate collection pond as observed during the November 1998 inspection, specifically include measures taken to address holes in the liner and overflow from the pond and ditch.
21. A copy of the analytical results, including the accompanying QA/QC, for the split samples collected during the EPA November 1998 inspection.
22. Provide any additional pertinent information.

Please submit the requested information to Linda Jacobson at the following address:

Linda Jacobson
Technical Enforcement Program (8ENF-T)
U.S. EPA, Region VIII
999 18th Street, Suite 500
Denver, CO 80202-2466

In your response to this letter, you must provide a signed copy of the Certification Statement enclosed with this letter. The certification statement must be signed and dated by a duly authorized officer or agent of Hecla Mining Corporation.

Failure to provide the requested information or submittal of incomplete and/or false information may subject you to liability, including the imposition of monetary penalties, pursuant to Section 3008 of RCRA, 42 U.S.C. 6928, and Section 309 of the CWA, 33 U.S.C. 1319.

The information requested by this letter must be provided notwithstanding its possible characterization as confidential business information or trade secret. However, you may request, in accordance with and subject to the limitations of 40 C.F.R. Part 2, treatment of certain information as Confidential Business Information (CBI). CBI requests must be made at the time of submission or such information may not be protected as CBI by EPA. You may assert such claim by placing on the information at the time submitted, a cover sheet, stamped or typed notice employing language so indicating, such as "Proprietary," "Company Confidential," "Trade

Secret," etc. If EPA determines the information you have designated meets the criteria in 40 C.F.R. Part 2, Section 2.208, the information will be disclosed only to the extent and by means of the procedures specified in 40 C.F.R. Part 2, Subpart B.

If you require clarification of this request, please contact Linda Jacobson of my staff at (303) 312-6503, for technical questions, or Linda Kato at (303) 312-6852, for any legal questions you may have.

Sincerely,



for Sharon L. Kercher, Director
Technical Enforcement Program

Enclosure

cc: Glenn Rogers, Chairman
Shivwits Band/Paiute Tribe
Charlotte Domingo
Paiute Tribe
Sue Groves, EPA
Effie Delmar, BIA
Flossie Girty, BIA
Pat Brewer, BIA
Don Terrell, EPA
Linda Kato, EPA
Allan Moore, UDEQ
Linda Jacobson, EPA

STATEMENT OF CERTIFICATION

I certify under the penalty of law, that I have personally examined and am familiar with the information submitted in the February 12, 1999, letter and attachments and with the information submitted in this document and all attachments, and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information.

Signature

Date

Name

Title